

DEPARTMENT OF WATER RESOURCES

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SEP 15 2011

Mr. Michael Machado, Executive Director
Delta Protection Commission
14215 River Road
Post Office Box 530
Walnut Grove, California 95690

Re: Department of Water Resources' review of the Draft Economic Sustainability Plan for the Sacramento – San Joaquin Delta (July 21, 2011)

Dear Mr. Machado:

Attached, please find comments by the Department of Water Resources on the Draft Economic Sustainability Plan for the Sacramento – San Joaquin Delta (July 21, 2011). We overlooked including them in our comments transmitted to you on September 2, 2011. We apologize for this oversight. We have sent these comments to the authors of the draft plan via email.

For further discussion on these comments, please contact Katherine Kelly, Bay-Delta Office Chief, at 653-1099.

Sincerely,

A handwritten signature in cursive script that reads "Dale K. Hoff-Floerke".

Dale Hoffman-Floerke
Deputy Director

Attachment

cc: Report authors via email to: espcomments@pacific.edu

Comments by the California Department of Water Resources
On the Draft Economic Sustainability Plan for the Sacramento-San Joaquin Delta
(version dated July 21, 2011)

General comment:

More citations are needed throughout this document; in many cases it's unclear what information is being used to support the findings.

As a general comment, it was difficult to judge the credibility of the many of the assertions and recommendations in the plan without more citations and references about the source of the information. Also, it was surprising to see no reference to DWR's 2007 Delta land use survey.

Page 59, lines 10-11

"...While it is the policy of the State to plan for 55 inches of sea-level rise by the year 2100, the probability of that magnitude of sea-level rise is actually very small."

Comment: Please provide a citation to support the claim that the probability of that magnitude of sea level rise by 2100 is actually very small. Also note that Ocean Protection Council (OPC) recently adopted a resolution on sea level rise (<http://www.opc.ca.gov/2011/04/resolution-of-the-california-ocean-protection-council-on-sea-level-rise/>) which in part states that (bold emphasis added) "... state agencies, **as well as non-state entities implementing projects or programs funded by the state** or on state property, including on lands granted by the Legislature, should not solely use SLR values within the lower third of the range in the latest CO-CAT guidance document, and instead **should generally assess potential impacts and vulnerabilities over a range of SLR projections, including analysis of the highest SLR values presented in the latest CO-CAT guidance document** ..." so any plans for levee modifications using state funds will need to consider sea level rise values presented in the latest CO-CAT guidance document (http://opc.ca.gov/webmaster/ftp/pdf/agenda_items/20110311/12.SLR_Resolution/SLR-Guidance-Document.pdf). This guidance document is also a useful resource for entities not using state funds when planning levee improvements. Suggest that the authors review both of these documents and use the information enclosed to inform this section and others where sea level rise estimates are considered.

Page 59, line 15

"...and allowing a choice of methods for raising the crest elevation in the event of actual sea-level rise" **Comment:** change to "...and allowing a choice of methods for raising the crest elevation as sea levels rise".

Baseline Scenario section – “...as some significant human and environmental changes are likely in the Delta between now and 2050. Population growth will continue in the Delta counties, some agricultural land will be developed in the secondary zone within city boundaries, **sea level is expected to increase by a foot...**” **General comment:** Consider including other expected changes to the climate by 2050 in your analysis. Based on climate projections presented in a 2009 DWR paper titled *Using Climate Projections to Support Water Resources Decision Making in California* (http://www.waterplan.water.ca.gov/docs/cwpu2009/0310final/v4c02a18_cwp2009.pdf) air temperature is expected to increase by 0.7°C-2.2°C (1.3°F-4.0°F) and precipitation in the Sacramento Valley is expected decrease by 2 to 19% by mid-century. Seasonal changes in flow is anticipated to impact the Delta as well, with increased chances of flooding in the winter (more precipitation falling as rain rather than snow) accompanied by lower flows in the spring in summer. These changes could have large impacts on the Delta's long-term economic sustainability and therefore should be considered in the baseline scenario.

Chapter 7

Notice that “employment in recreation...” has been static for at least two decades (p.110) – that is why the Delta Outdoor Recreation Survey (DORS) is still relevant. The draft plan (p.137) wants to look forward “50 years” by reviewing the past – so the DORS is even more relevant for that purpose. The DORS is the “primary data” that the draft plan purports “does not exist” (p. 128 et seq.).

It doesn't seem a valid assumption that “all 275,000” anglers who purchased a stamp spent every one of their “average 12” days of fishing each year IN the Delta...(So usage might be over-estimated, and thus impacts also over-estimated to some degree...)

It would be good to analyze long-term attendance trends at a specific site – like Brannan Island SRA (this is easy to obtain and would strengthen or otherwise add perspective to the analysis).

Page 146

The last bullet above the start of Section 3.7 underscores the concern of whether recreation facilities will continue to be available – it introduces an opportunity (missed) to propose mitigation opportunities for any “recreation impacts” that may or may not be associated with conveyance or flooded islands or any proposed project... (other dimensions of such a concept are raised on page 142 -- and then some such opportunities are finally raised on page 144).

Page 155

This text states the draft plan assumes that a conveyance project would be “mitigated appropriately” – but this assumption is not effectively applied in other areas of the document. On page 156, there are provided visions of how recreation could be benefitted by various projects – but these seem to not be carried through to conclusions.

Page 157

Recommend providing why more explanation supporting “open water” (flooded islands) would not provide recreation opportunity and that the congregation of numerous marinas would actually suffer under such a project.

Page 162

The last two bullets need to be presented as an opportunity to offset each other – obviously there are mitigation opportunities that are not elaborated upon and, in fact, dismissed which lead to negative conclusions.

We strongly endorse the recommendation for “new recreation data” to be collected; this appears a couple of times in the document. The “Delta Outdoor Recreation Survey” (DORS) of 1980 should be referenced in the draft plan and would be a good model for developing a useful future survey.